

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., *et al.*,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee, *et
al.*,

Defendants.

LEAGUE OF WOMEN VOTERS OF
TENNESSEE, *et al.*,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee, *et
al.*,

Defendants.

Civil No. 3:19-cv-365
Judge Aleta A. Trauger

JOINT MOTION FOR ORDER ON MOTION TO QUASH

On January 15, 2020, non-party movant Linda Phillips, Shelby County Administrator of Elections, filed a motion to quash a subpoena for documents issued by Plaintiffs in this action under Federal Rule of Civil Procedures 45 (Dkt. No. 81). Plaintiffs and Movant, by and through their attorneys, have conferred and reached agreements as to the documents and communications

that Movant will and will not produce in response to the Subpoena, as well as new deadlines for the production of these documents.

Given these agreed modifications to the Subpoena, Movant Phillips and Plaintiffs, by and through their respective undersigned counsel, request this Court to approve and enter the Proposed Order on Motion to Quash Subpoena, attached hereto, which reflects the parties' agreements regarding the Subpoena and allow Movant Phillip to withdraw her motion to quash.

Dated: February 19th, 2020

Respectfully submitted,

Counsel for the Movant:

/s/ Pablo A. Varela

John L. Ryder (Tenn. Disc. No. 8258)
Steven N. Douglass (Tenn. Disc. No. 9770)
Pablo A. Varela (Tenn. Disc. No. 29436)
Harris Shelton Hanover Walsh, PLLC
40 S. Main Street, Suite 2210
Tel: (901) 525-1455
Fax: (901) 526-4084
jryder@harrisshelton.com
pvarela@harrisshelton.com
sdouglass@harrisshelton.com

*Counsel to Linda Phillips and
The Shelby County Election Commission*

Counsel for the Plaintiffs:

/s/ Sophia Lin Lakin

Sophia Lin Lakin*
Theresa J. Lee*
Davin Rosborough*
Dale E. Ho*
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Tel.: (212) 549-2500
slakin@aclu.org

tlee@aclu.org
drosborough@aclu.org
dho@aclu.org

Thomas H. Castelli, BPR#024849
Legal Director
ACLU Foundation of Tennessee
P.O. Box 120160
Nashville, TN 37212
Tel.: 615-320-7142
tcastelli@aclu-tn.org

Sarah Brannon*, **
American Civil Liberties Union Foundation
915 15th Street, 6th Floor
Washington, DC 20005
Tel.: (202) 544-1681
sbrannon@aclu.org
** not admitted in DC; DC practice limited to
federal court only

Danielle Lang*
Molly Danahy*
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Tel.: (202) 736-2200
dlang@campaignlegal.org
mdanahy@campaignlegal.org

William H. Harbison, BPR#7012
C. Dewey Branstetter, Jr. BPR#9367
Hunter C. Branstetter, BPR#32004
Sherrard Roe Voigt & Harbison
150 3rd Avenue South, Suite 1100
Nashville, TN 37301
Tel.: (615) 742-4200
bharbison@srvhlaw.com
dbranstetter@srvhlaw.com
hbranstetter@srvhlaw.com

Michelle Kanter Cohen*
Cecilia Aguilera*
Jon Sherman*
Fair Elections Center
1825 K Street NW, Suite 450

Washington, DC 20006
Tel.: (202) 331-0114
mkantercohen@fairelectionscenter.org
caguilera@fairelectionscenter.org
jsherman@fairelectionscenter.org

Attorneys for Plaintiffs in *League of Women Voters of Tennessee, et al. v. Hargett*

Jon Greenbaum*
Julie Houk*
Pooja Chaudhuri*
Lawyers' Committee for Civil Rights Under Law
1500 K Street, NW, Suite 900
Washington, D.C. 20005
(202) 662-8600
erosenberg@lawyerscommittee.org
ihouk@lawyerscommittee.org
nehaudhuri@lawyerscommittee.org

Ira M. Feinberg*
Hogan Lovells US LLP
390 Madison Avenue
New York, NY 10017
(212) 918-3509
irafeinberg@thoganlovells.com

Allison M. Ryan*
Carolyn A. Delone*
Madeline Gitomer*
Kyle Druding*
Hogan Lovells US LLP
555 Thirteenth Street, NW
Washington, DC 20004
(202) 637-5600
allison.ryan@hoganlovells.com
carrie.delone@hoganlovells.com
madeline.gitomer@hoganlovells.com
kyle.druding@hoganlovells.com

Yael Bromberg*
Bromberg Law LLC
The Andrew Goodman Foundation
10 Mountainview Road

Upper Saddle River, NJ 07458
(201) 995-1808
yaelbromberglaw@gmail.com

Taylor A. Cates, BPR No. 20006
Burch, Porter & Johnson, PLLC
130 N. Court Avenue
Memphis, TN 38103
(901) 524-5165
tcates@bpjlaw.com
wirvine@bpjlaw.com

Attorneys for Plaintiffs in *Tennessee State Conference of the N.A.A.C.P., et al. v. Hargett*

*admitted *pro hac vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has been served on February 19, 2020 by operation of the Court's electronic filing system on the following:

Alexander S. Rieger
Kelley L. Groover
Andrew B. Campbell
Office of the Attorney General and Reporter
War Memorial Building, 3rd Floor
P.O. Box 20207
Nashville, TN 37202
(615) 741-2408
alex.rieger@ag.tn.gov
kelley.groover@ag.tn.gov
andrew.campbell@ag.tn.gov

/s/ Pablo A. Varela

Pablo A. Varela